

Information Collection Justification

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The USDA/1890 National Scholars Program is an annual recruiting effort by USDA Agricultural Liaison Officers and the participating eighteen 1890 Land-Grant Universities. This human capital initiative is a collective effort geared toward attracting graduating high school seniors and currently enrolled college students, who are rising sophomores or juniors, into pursuing disciplines in agriculture, natural resources, and related sciences at any of the 1890 Land-grant Universities.

The USDA/1890 National Scholars Program offers scholarships to U.S. citizens who are seeking a bachelor's degree at one of the eighteen 1890 Historically Black Land Grant Universities. National Scholars are required to study in the following or related disciplines: Agriculture, Agricultural Business/Management, Agricultural Economics, Agricultural/Civil/Mechanical Engineering, Agricultural Production and Technology, Agronomy or Crop Science, Animal Sciences, and Botany.

Each 1890 applicant will be required to submit either a hard copy of a USDA/1890 National Scholars Program Application Form or apply on-line electronically (to be set up in the future) to their respective USDA Agricultural Liaison Officer assigned to the 1890 Land-Grant University to which they want to apply. The hard copy USDA/1890 National Scholars Program application does not request Personally Identifiable Information (PII) in the form of a Social Security Number or date of birth, but does ask for a permanent address, which is PII. The USDA Agricultural Liaison Officer verifies applicant information, sanitizes (by whiting out) applications of PII, sets up an applicant review committee and sends forward to 1890 Program Director the top 10 applications per university. If the applicant is a currently enrolled college student, they must submit a resume, official copy of transcript Submit an official transcript to include grades through fall semester; Submit a resume; Submit two letters of recommendation from the following: Department Head, Dean of College, or one of the Vice Presidents of University/College Professor who has taught you; submit 500-800 word essay describing your interest in USDA and how you envision the scholarship will impact you and your future as a public servant. Also describe your experiences and perceptions about agriculture, food, and natural resource sciences. The 1890 Program does not keep PII on applicants, only very generalized information that does

not contain PII. The 1890 Program Director forwards sanitized applications to USDA/Agency selecting managers, whose agencies have pledged committed funds to support a scholar(s), for evaluation, interview and final selection. The USDA Human Resources Department of the Agency sponsoring each scholar will prepare the Student Career Experience Program (SCEP) paperwork needed by each selected scholar and requires students to fill out a U.S. Office of Personnel Management Optional Application for Federal Employment (OF-612).

- 2. Indicate how, by whom, how frequently, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The Purpose of the USDA/1890 National Scholar Program is to:

- (1) strengthen the long-term partnership between USDA and the 1890 institutions;*
- (2) increase the number of students studying agriculture, food, natural resource sciences, or other related disciplines; and*
- (3) offer career opportunities to USDA/1890 National Scholars at the U.S. Department of Agriculture.*

The USDA/1890 Programs Office provides each of the 18 universities with applications and brochures for distribution in their respective recruiting area and events as well as for those individual requests. The USDA/1890 Program also distributes applications through its network and at the request of individuals and organizations. Recruitment cycle for the National Scholars Program normally starts the first week of September and ends by February 1st.

- A. Applicant completes the application packet by established deadline, ensures all responses from high school and university representatives are submitted by deadline and mails to the liaison office of the University of their choice;*
- B. University representatives prepare and submit letters of recommendations on behalf of the currently enrolled college applicant*
- C. Liaison Officer verifies applications to ensure applicants meet minimum eligibility requirements*
- D. Each of the 1890 University establishes screening committee to select up to 10 finalists to forward to USDA/1890 National Scholars Program Manager*
- E. Program Manager enters general information (name, hometown, university(s) attending, major, grade point average, and test scores) on each finalist to establish a profile*

- F. Program Manager distributes the profiles through a meeting with Agency Coordinators and upon request from agency coordinators provides actual copies of the requested candidates' application to as a means to gain insight of potential candidate for scholarship consideration.
- G. Agency coordinator(s) is responsible for safeguarding the privacy of the information contained in the candidate's application.
- H. The USDA/1890 National Scholars Program will provide full tuition, employment, employee benefits, fees, books, use of a laptop computer, a printer, and software while on scholarship, and room and board for each academic year while pursuing a bachelor's degree at the following universities:

*Alabama A&M University
Alcorn State University, Mississippi
Delaware State University
Florida A& M University
Fort Valley State University, Georgia
Kentucky State University
Langston University - Oklahoma
Lincoln University, Missouri
North Carolina A&T State University
Prairie View A&M University, Texas
South Carolina State University
Southern University, Louisiana
Tennessee State University
Tuskegee University, Alabama
University of Arkansas - Pine Bluff
University of Maryland – Eastern Shore
Virginia State University
West Virginia State University*

3. **Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.**

The USDA/1890 National Scholars Program is an on-line application located on the Office of the Assistant Secretary for Civil Rights' website (www.ascr.usda.gov/1890programs.html). The application is a fillable form that can be completed on our website then printed and mailed.

4. **Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.**

USDA is the only agency (Department) that collects this information.

5. **If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

This collection does not impact small businesses or other small entities.

6. **Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

If the program did not exist, USDA would be unable to Award scholarships to the applicants.

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner consistent with the guidelines in 5 CFR 1320.5**

The information collection is conducted in a manner consistent with the guidelines established in 5 CFR 1320.5.

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**

- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.**

A public notice with request for comments for this application was published in the Federal Register regarding this information collection and program guidelines. No comments were received during the allotted time period. The notice was posted on Friday, August 22, 2008, Vol. 73, No. 164.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting form, and on the data elements to be recorded, disclosed, or reported.

*Lucille Shaw (773-535-2513, High School Instructor/Counselor)
Lisa Williamson (304-766-4291), 1890 Administrative Assistant
Steven Couch (248-918-1699), Undergraduate Student
Keyana Ellis (301-785- 1651), Graduate Student*

Individuals reviewed and completed application to assess time needed to complete package and clarity of questions.

- 9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

This information collection activity involves no payments or gifts to respondents.

- 10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

No additional assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

This information collection activity will ask no questions of a personal or sensitive nature.

- 12. Provide estimates of the hour burden of the collection of information. The statement should:**

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

Estimated hour burden of the collection of information from graduating high school seniors

Respondents: USDA/1890 National Scholars Program Applicants

Note: Three individuals (high school student, teacher, and guidance counselor) complete a section of each application

Estimated number of Respondents to complete all sections of application.... 1,200

Estimated Average time to complete whole application..... 3.00 hours

Applicant section..... 1.5 hours

Teacher section..... 45 minutes

Counselor section..... 45 minutes

Estimated Average time per respondent.....	1 hour
Estimated number of respondents per application.....	3
Estimated total Annual Response.....	1,200
Estimated total Collection Burden.....	3,600 hours

Estimated hour burden of the collection of information from currently enrolled college student

Respondents: USDA/1890 National Scholars Program Applicants

Note: Three individuals (college student, college professor, and department head, dean of college, or one of the Vice Presidents of University) complete a section of each application

Estimated number of Respondents to complete all sections of application....	300
Estimated Average time to complete whole application.....	3.00 hours
Applicant section.....	2.0 hours
Professor section.....	30 minutes
Department Head, Dean, or Vice President of University section.....	30 minutes

Estimated Average time per respondent.....	1.0 hour
Estimated number of respondents per application.....	3
Estimated total Annual Response.....	300
Estimated total Collection Burden.....	300 hours

Total Estimated hour burden of the collection of information per scholarship cycle

Estimated total Annual Response.....	1,500
Estimated total Collection Burden.....	3,900 hours

Estimated annualized cost to respondents of the hour burdens of the collection of information from graduating high school senior

Burdens for collections of information.....	\$167,400.00
Applicant section (\$6/hr @ 1.5 hours).....	\$ 9.00
Teacher section (\$25/hr @ 0.75 hours).....	\$18.75
Counselor section (\$25/hr @ 0.75 hours).....	\$18.75

Burden cost for collection \$ 46.50

Estimated annualized cost to respondents of the hour burdens of the collection of information from currently enrolled college student

Burdens for collections of information.....	\$ 14,100.00
Applicant section (\$6/hr @ 2.0 hours).....	\$ 12.00
Professor section (\$30/hr @ .50 hours).....	\$ 15.00
Department Head, Dean, or Vice President of University section (\$40/hr @ 0.50 hours).....	\$ 20.00

Burden cost for collection	\$ 47.00
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Total Estimated annualized cost to respondents of the hour burdens of the collection of information per scholarship cycle

Burdens for collections of information for high school applicants.....	\$ 167,400.00
Burdens for collections of information for college applicants.....	\$ 14,100.00

Burden cost for collection total	\$ 181,500.00
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Applicant completes his/her section of application and forwards the other two sections to teacher and counselor or to professor and department head, dean, or university vice president for completion. Applicant wages based on minimum wages + general mailing cost associated with mailing document. Teacher and counselor, professor, department head, and university vice president average salaries were used Applicant spends around than two hours completing their required section and teacher and counselor utilizes less than one hour each to complete their section.

- 13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.**

There is zero annual cost burden associated with capital or start-up costs.

- 14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

Annual Federal Government Cost

Estimated Mailing Cost + Shipping/Handling for NSPM to send applicants to University & others.....\$ 5,800.00

Estimated Printing Cost of 10,000 Applications. \$ 18,000.00

Estimated Mailing cost/university to mail applications to candidates \$100.00 x 18 Universities.....\$ 1,800.00

Estimated Travel Time for Recruiting 10% of salary (\$70,000 = \$7,000) x 18 Universities.....\$ 126,000.00

Estimated time for Ag Liaison Officer to screen applications upon receipt 22 applications averaged/university 30 minutes each = 11 hours X \$32/hr = \$352/University\$ 6,336.00 Hours prepping applications for screening by University selection committee 3 hours @ \$32/hr = \$ 96.00 x 18 Universities =\$ 1,728.00

Mailing cost per university (\$45) to mail applicants to NSPM.....\$ 810.00

NSPM development of Profiles for distribution to Agencies & Prep \$45/hr x 2 hours x 18 Universities.....\$ 1,620.00

Total Annual Federal Government Cost.....\$ 162,094.00

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

There is a change in burden from 3,600 hours to 3,900 hours due to expanding the eligibility requirements to include currently enrolled college students.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

Civil Rights has no plans to publish information it collects in connection with this program.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Civil Rights will display the date and OMB control number.

18. Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act."

Civil Rights can certify compliance with all provisions in the Act.